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October 4, 2022

Via ECF

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street, Room 1310
New York, NY 10007

Re: Request for Oral Argument on Motion for a Stay of Nonmonetary Sanctions; *In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-01570 (GBD) (SN)

Dear Judge Daniels:

I, together with Kirsch & Niehaus PLLC, represent the law firm Kreindler & Kreindler LLP (“K&K”) in connection with the sanctions entered against K&K by Magistrate Judge Sarah Netburn on September 21, 2022, pursuant to Federal Rule of Civil Procedure 37(b)(2)(A). *See* Opinion & Order, Dkt. No. 8544. The monetary and nonmonetary sanctions entered against the law firm—including the removal of K&K from the Plaintiffs’ Executive Committee after more than two decades at the helm of this multidistrict litigation—are effective “immediately.” *Id.* at 65.

Earlier today, we filed a motion by order to show cause for a stay of the nonmonetary sanctions entered against K&K, pending resolution of its Rule 72(a) objections due October 21, 2022.

Pursuant to Section IV.D of your Honor’s Individual Rules and Practices, I respectfully request oral argument on K&K’s motion for a stay.

Respectfully submitted,

/s/ Edward M. Spiro

Edward M. Spiro